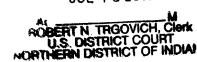
JUL 192017

# UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF INDIANA HAMMOND DIVISION



| UNITED STATES OF AMERICA | ) | CAUSE NO. 2 17 CR       | 82 |
|--------------------------|---|-------------------------|----|
|                          | ) |                         |    |
| v.                       | ) | 18 U.S.C. § 2251(a)     |    |
|                          | ) | 18 U.S.C. § 2252(a)(2)  |    |
|                          | ) | 18 U.S.C. § 1470        |    |
| ADAM RUSSELL HEGYI       | ) | 18 U.S.C. § 2261A(2)(B) |    |

### **INDICTMENT**

### THE GRAND JURY CHARGES:

# COUNT 1 (Production of Child Pornography Depicting A.S.)

Between on or about January 1, 2015 and on or about June 6, 2017, in the Northern District of Indiana and elsewhere, the defendant,

## ADAM RUSSELL HEGYI,

attempted to and did knowingly employ, use, persuade, induce, entice and coerce a minor female known to the Grand Jury as A.S., to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct where such visual depiction was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means.

All in violation of Title 18, United States Code, Section 2251(a).

# COUNT 2 (Production of Child Pornography Depicting M.T.)

Between on or about January 1, 2015 and on or about June 6, 2017, in the Northern District of Indiana and elsewhere, the defendant,

### ADAM RUSSELL HEGYI,

attempted to and did knowingly employ, use, persuade, induce, entice and coerce a minor female known to the Grand Jury as M.T., to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct where such visual depiction was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means.

All in violation of Title 18, United States Code, Section 2251(a).

# COUNT 3 (Receipt of Child Pornography)

Between on or about January 1, 2015 and on or about June 6, 2017, in the Northern District of Indiana and elsewhere, the defendant,

# ADAM RUSSELL HEGYI,

did knowingly receive, using any means and facility of interstate and foreign commerce, one or more visual depictions of actual minors under the age of eighteen (18) engaging in sexually explicit conduct where such visual depiction is of such conduct.

All in violation of Title 18, United States Code, Section 2252(a)(2).

# COUNT 4 (Transfer of Obscenity to A.S.)

Between on or about January 1, 2015 and on or about June 6, 2017, in the Northern District of Indiana and elsewhere, the defendant,

## ADAM RUSSELL HEGYI,

did knowingly use a facility of interstate commerce, that is, the Internet, to intentionally transfer obscene matter, that is, one or more images depicting his exposed and erect penis, to a minor female known to the Grand Jury as A.S., who had not attained the age of 16, knowing that A.S. had not attained the age of 16.

All in violation of Title 18, United States Code, Section 1470.

# COUNT 5 (Distribution of Child Pornography)

Between on or about January 1, 2017 and on or about June 6, 2017, in the Northern District of Indiana and elsewhere, the defendant,

## ADAM RUSSELL HEGYI,

did knowingly distribute, using any means and facility of interstate and foreign commerce, one or more visual depictions of actual minors under the age of eighteen (18) engaging in sexually explicit conduct where such visual depiction is of such conduct.

All in violation of Title 18, United States Code, Section 2252(a)(2).

# COUNT 6 (Online Stalking of A.S.)

Between on or about January 1, 2015 and on or about June 6, 2017, in the Northern District of Indiana and elsewhere, the defendant,

### ADAM RUSSELL HEGYI,

with the intent to injure, harass and intimidate another person, that is, a minor female known to the Grand Jury as A.S., knowingly used any facility of interstate or foreign commerce, that is, the Internet, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to minor A.S.

All in violation of Title 18, United States Code, Sections 2261A(2)(B) and 2261(b)(5).

#### SEXUAL EXPLOITATION FORFEITURE ALLEGATIONS

- 1. The allegations of Counts 1, 2, 3 and 5 of this Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeitures to the United States of America pursuant to the provisions of Title 18, United States Code, Section 2253.
- 2. The allegations of Count 4 of this Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeitures to the United States of America pursuant to the provisions of Title 18, United States Code, Section 1467.
- 3. Upon conviction of Counts 1, 2, 3, 4 or 5 of the Indictment, the defendant shall forfeit to the United States of America all property, real and personal, used or intended to be used to commit or to promote the commission of such offense(s), including but not limited to:
  - a. HP laptop computer, Model g7-1075dx, S/N CNF1152QGD;
  - b. Purple Verbatim 16GB flash drive;
  - c. Teal Lexar 16GB flash drive;
  - d. Acer laptop computer, Model MS2377, S/N NXM8WAA0073200DBD32000;

- e. MSI computer motherboard with accessories, including a 120GB PNY CS1311 solid state hard drive;
- f. e-Machines desktop computer, Model ET1831, S/N PTNB602021003016012700;
- g. Pink 16GB Lexar USB drive;
- Sony MRW-EA7 multi-card reader/writer containing Lexar
   Platinum II 4GB compact flash card;
- i. Black and red SanDisk 64GB USB drive, Cruzer slide;
- j. Compaq Presario, Model CQ61, S/N CNF0059TD3; and
- k. Samsung Galaxy S7 active, Model SM-G891A, IMEI 358518072206179.

In furtherance of Title 18, United States Code, Sections 2253 and 1467.

A TRUE BILL:

/s/ FOREPERSON
FOREPERSON

CLIFFORD D. JOHNSON ACTING UNITED STATES ATTORNEY

By: /s/ Jill R. Koster

Jill R. Koster Assistant U.S. Attorney Northern District of Indiana